

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 04-
v.	:	18 U.S.C. § 371
PATRICIA GERBER, STEVEN CITRON, and RALPH W. FREITAS	:	<u>INFORMATION</u>
	:	

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. Patricia Gerber was a small purchase buyer employed by the Department of Defense, Naval Air Engineering Station, (hereinafter, "NAES") Lakehurst, New Jersey.

b. As a small purchase buyer, Gerber was issued government purchase cards having numbers ending in 185 and 674, in order to procure all necessary supplies and equipment for the Manufacturing and Engineering Department at NAES.

c. Ralph W. Freitas was the owner of Motorcycle Transport Inc. trading as The Shipping Room, in Toms River, New Jersey.

d. Steven Citron was employed by the Department of Defense, NAES, in the Support and Equipment Division of the Manufacturing and Engineering Department. He was also employed at the Home Depot in Toms River, New Jersey. Defendant Citron is the son-in-law of defendant Freitas.

2. From in or about March 1998 through in or about September 1999, in Ocean County, in the District of New Jersey and elsewhere, defendants

PATRICIA GERBER,
STEVEN CITRON, and
RALPH W. FREITAS

did knowingly and wilfully conspire and agree with each other and with others to embezzle, steal, purloin and convert to their own use and the use of others, money and things of value of the United States, namely personal purchases charged to a United States government credit card account, in the amount of approximately \$106,579.59, contrary to Title 18, United States Code, Section 641.

OVERT ACTS

3. In furtherance of the conspiracy and to effect its objects, the following overt acts were committed in the District of New Jersey and elsewhere:

a. In or about March of 1998, defendant Gerber began using her government-issued purchase card to purchase items for her personal use, billing the items to the Department of Defense, and paying for the items with funds from the United States Treasury.

b. Among the items that Gerber fraudulently purchased were a computer, surround sound system, jet scanner, power washer and two artificial palm trees.

c. Defendant Citron purchased the items referred to in paragraph (b) above from Gerber, knowing that they had been fraudulently purchased through the use of Gerber's government-issued purchase card.

d. In or about September of 1998, Gerber asked defendant Citron whether

she could have some of the fraudulently purchased items delivered to The Shipping Room, owned by defendant Freitas.

e. In or about June 1999 defendant Citron introduced defendant Gerber to defendant Freitas.

f. From in or about June of 1999, to September of 1999, defendant Frietas, at defendant Gerber's direction, created fraudulent invoices and packing slips which purported to represent the purchase of items commonly used by the Manufacturing and Engineering Department.

g. Defendant Frietas charged defendant Gerber's government-issued purchase card for an amount pre-arranged with defendant Gerber, but never delivered the goods or services contained on the purchase order and identified above at paragraph (f).

h. Defendant Frietas, at defendant Gerber's direction, purchased the items for defendant Gerber using his company account and delivered the items to defendant Gerber's residence in Browns Mills, New Jersey.

In violation of Title 18, United States Code, Section 371.

CHRISTOPHER J. CHRISTIE
UNITED STATES ATTORNEY